

EXHIBIT 1

Fried, Michelle

From: Rios, Jorge [Jrios@rossmed.edu.dm]
Sent: Monday, January 27, 2003 3:13 PM
To: Fried, Michelle
Subject: RE: John Horton

I am used to deal with very different people and indeed he has the most experienced CV and has also worked as a Peace Corp Volunteer here in Dominica. So, since I would like to avoid a long void between Elizabeth departure and a replacement we need to proceed.

-----Original Message-----

From: Fried, Michelle
Sent: Monday, January 27, 2003 3:59 PM
To: Rios, Jorge
Cc: St. James, John
Subject: John Horton

As we have discussed over the past few days, I have a bad "feeling" regarding John Horton. I have sent you the emails he has sent me and my responses.

I just sent him an email asking to call me or Power Travel so that we can finalize his itinerary. he left me an voice message saying that I should email him and he will call me back, however, I cannot talk to him on speaker phone -- I must pick up the telephone!!

Dr, Rios, before we go ahead with his ticket, hotels, and other incidental costs, perhaps, we should postpone his trip since you do have 2 other candidates coming down for the position of Librarian.

Can you please email Mr. Horton and copy me.

Thanks.

Michelle

EXHIBIT 2

Fried, Michelle

From: john horton [johndhorton@yahoo.com]
Sent: Monday, January 27, 2003 3:12 PM
To: Fried, Michelle
Subject: RE: Below is your itinerary - please advise. Thanks. Michelle

I called Mr. Power and he said that he would be emailing me all required documentation.

I think I'm done now or did I need to telephone (preferably email) you about anything?

Thank you.

John D. Horton

--- "Fried, Michelle" <mfried@rossmed.edu> wrote:

>
> Sorry, 1-800-714-7618
> -----Original Message-----
> From: john horton [mailto:johndhorton@yahoo.com]
> Sent: Monday, January 27, 2003 2:30 PM
> To: Fried, Michelle
> Subject: RE: Below is your itinerary - please
> advise. Thanks. Michelle
>

> I just telephoned 1-800-714-7616 and got an "eye
> ware"
> company. Could you please confirm that telephone
> number.

> Thank you.

> John D. Horton

> --- "Fried, Michelle" <mfried@rossmed.edu> wrote:

> > It is urgent you call our Travel Agent Tom Backer
> > at
> > Power Travel
> > 1-800-714-7616 so that we can secure ticketing for
> > your reservation. You
> > must call me as soon as possible. Is is expecting
> > your call.

> > Michelle

> > -----Original Message-----

> > From: john horton [mailto:johndhorton@yahoo.com]
> > Sent: Monday, January 27, 2003 2:13 PM
> > To: Fried, Michelle
> > Subject: Re: Below is your itinerary - please
> > advise. Thanks. Michelle

> > Are you sending something (e.g. airline tickets)
> > through the US Postal Service to my address:

> > John D. Horton

> > GENERAL DELIVERY

> > DUPONT WA 98327-9999
> >
> > which I will need to pick up? If yes, did you
> send
> > it
> > on Friday?
> >
> > Thank you
> >
> > John D. Horton
> >
> > --- "Fried, Michelle" <mfried@rossmed.edu> wrote:
> > > Print this page | Close window | Help
> > > Itinerary
> > > JOHN D HORTON
> > > Reservation code: ECMROQ
> > >
> > > Travel Arranger Priority Comments:
> > >
> >
>

> > > TRACKING CODE - 7041-USMED-LIB
> > > FULL FARE - 940.00
> > > FARE PAID - 0.00
> > > REMARKS -
> > >
> >
>

> > >
> >
>

> > > MICHELLE HERE IS ITIN WHICH IS AVAIL FOR CERTIF
> > > PLEASE CONFIRM IF OK SO WE CAN CALL AA TO SECURE
> > > SPACE THEN WE WILL PROCESS HOTEL IN SAN JUAN
> > > THANK YOU - TOM BACKER/POWER TRAVEL
> > >
> >
>

> > >
> > >
> > > FLIGHTS
> > >
> > > Sat, Feb 1: AMERICAN AIRLINES, AA 1302
> > >
> > > From: SEATTLE TACOMA, WA (SEA) Departs:
> > 7:23am
> >
> > >
> > > To: DALLAS FT WORTH, TX (DFW) Arrives: 1:08pm
>
> >
> > > Class: Economy Seat: Check-In Required
> > > Status: On Request Confirmation:
> > > Meal: Breakfast Smoking: No
> > > Aircraft: MCDONNELL DOUGLAS MD-80 JET
> > Mileage:
> >
> > > 1663
> > > Flight Time: 3 hours and 45 minutes
> > > Verify flight times prior to departure

>>>
>>>
>>>
>>> Sat, Feb 1: AMERICAN AIRLINES, AA 1838
>>>
>>> From: DALLAS FT WORTH, TX (DFW) Departs:
> 3:37pm
>>
>>>
>>> Departure Terminal: TERMINAL A
>>> To: SAN JUAN PR, PUERTO RICO (SJU) Arrives:
>>> 10:08pm
>>> Arrival Terminal: TERMINAL D
>>> Class: Economy Seat: Check-In Required
>>> Status: On Request Confirmation:
>>> Meal: Dinner Smoking: No
>>> Aircraft: BOEING 757 JET Mileage: 2156
>>> Flight Time: 4 hours and 31 minutes
>>> Verify flight times prior to departure
>>>
>>>
>>>
>>> Sun, Feb 2: AMERICAN AIRLINES, AA 5140
>>> Operated by AMERICAN EAGLE/EXECUTIVE
>>>
>>> From: SAN JUAN PR, PUERTO RICO (SJU) Departs:
>>> 1:00pm
>>> Departure Terminal: TERMINAL D
>>> To: MELVILLE HALL, DOMINICA (DOM) Arrives:
>> 2:46pm
>>>
>>> Class: Economy Seat: Check-In Required
>>> Status: On Request Confirmation:
>>> Meal: Smoking: No
>>> Aircraft: ATR TURBOPROP TURBOPROP Mileage:
>> 376
>>>
>>> Flight Time: 1 hours and 46 minutes
>>> Verify flight times prior to departure
>>>
>>>
>>>
>>> Wed, Feb 5: AMERICAN AIRLINES, AA 5141
>>> Operated by AMERICAN EAGLE/EXECUTIVE
>>>
>>> From: MELVILLE HALL, DOMINICA (DOM) Departs:
>>> 3:15pm
>>> To: SAN JUAN PR, PUERTO RICO (SJU) Arrives:
>>> 4:58pm
>>> Arrival Terminal: TERMINAL D
>>> Class: Economy Seat: Check-In Required
>>> Status: On Request Confirmation:
>>> Meal: Smoking: No
>>> Aircraft: ATR TURBOPROP TURBOPROP Mileage:
>> 376
>>>
>>> Flight Time: 1 hours and 43 minutes
>>> Verify flight times prior to departure
>>>
>>>
>>>
>>> Thu, Feb 6: AMERICAN AIRLINES, AA 1505
>>>
>>> From: SAN JUAN PR, PUERTO RICO (SJU) Departs:

>>> 8:20am
>>> Departure Terminal: TERMINAL D
>>> To: DALLAS FT WORTH, TX (DFW) Arrives:
> 11:36am
>>
>>>
>>> Arrival Terminal: TERMINAL A
>>> Class: Economy Seat: Check-In Required
>>> Status: On Request Confirmation:
>>> Meal: Breakfast Smoking: No
>>> Aircraft: BOEING 757 JET Mileage: 2156
>>> Flight Time: 5 hours and 16 minutes
>>> Verify flight times prior to departure
>>>
>>>
>>> Thu, Feb 6: AMERICAN AIRLINES, AA 1763
>>>
>>> From: DALLAS FT WORTH, TX (DFW) Departs:
> 2:35pm
>>
>>>
>>> To: SEATTLE TACOMA, WA (SEA) Arrives: 4:53pm
>
>>
>>> Class: Economy Seat: Check-In Required
>>> Status: On Request Confirmation:
>>> Meal: Snack or Brunch Smoking: No
>>> Aircraft: MCDONNELL DOUGLAS MD-80 JET
> Mileage:
>>
>>> 1663
>>> Flight Time: 4 hours and 18 minutes
>>> Verify flight times prior to departure
>>>
>
=== message truncated ===

Do you Yahoo?
Yahoo! Mail Plus - Powerful. Affordable. Sign up now.
<http://mailplus.yahoo.com>

EXHIBIT 3

Fried, Michelle

From: BackerTom@aol.com
Sent: Monday, January 27, 2003 3:13 PM
To: mfried@rossmed.edu
Subject: Re- John Horton

Michelle,

I received a call from Dr. Horton, that seemed a little ODD. He keep saying to me in a load and annoyed voice:

THIS IS JOHN HORTON THE ANSWER IS YES,

He told me he did not know why everyone in the world needed to hear from him about the itinerary. I told him we simply wanted to confirm he had the travel information.

He said YES YES YES YES -

I told him I would email him an itinerary.

- As per yours and Dr. Rios instructions I have Canceled the reservations. Make sure that you have Dr. Rios email him as he does not have a phone.

Thank you - Tom Backer/Power Travel

1/27/2003

EXHIBIT 4

review for ML VO
not enough med lib
esp

moved positions frequently
not much input esp

Holmberg, Christine

From: john horton [johndhorton@yahoo.com]
Sent: Wednesday, April 09, 2003 6:58 PM
To: cholmberg@rossmed.edu
Subject: Position Desired: Library Director - Medical

John D. Horton
 General Delivery
 Wrightstown, NJ 08562-9999

Email: JohnDHorton@Yahoo.com

Country of Citizenship: United States of America
Veteran's Preference: No
Highest Grade: GS-1410-9, 06/2002 - 08/2002
Contact Current Supervisor: Yes

OBJECTIVE:

Seeking exciting librarian position utilizing my 22-years of experience working in academic, law, special and medical libraries. I have a Master's Degree in Library Science and have worked in library reference services, cataloging and administration. I am an Hispanic minority male applicant over the age of 40 years. I have added ethnic and cultural diversity to my employer's work force.

WORK EXPERIENCE:

**Veteran's Health Administration Medical Center
 Library**
 3900 University Ave
 Philadelphia, PA 19104-4594

Dates Employed: 02/2003-
 Present
Grade Level: GS-7 Step 5
Hours per Week: 40

2 mo

Library Technician (Medical), 1411
 Responsible for serials control of over 400 titles with irregular publications times. Uses complex serials control computerized check-in system. Advises Library Director of subscription discrepancies. Responsible for adding, deleting, updating and submitting the Library Service's annual subscription renewals of medical, patient and administrative journals to vendor including payment follow-ups to assure receipt of journals without lapses. Notes missing issues and submits claims via electronic mail system to vendor. Responsible for direct contact with vendor regarding recurring problems. Organizes and operates the service's accounting system. Responsible for assigning correct department codes and sub-account classifications to all obligation records. Verifies pricing information on 2237's. Utilizes the Integrated Funds Distribution, Control Point Activity, Accounting and Procurement (IFCAP) system to report, record and amend credit card purchases. Acts as Purchase Card User to pay for goods and services and reviews the payments made to the purchase card account. Notifies the Library Director, on timely basis, when recurring expenses (such as newspaper delivery or on-line

computer service) must be obligated. Responsible for maintaining accurate record of received items. Typically, 25-50 unique items (books/audio-visuals) are on each purchase order; delivery is split, and occurs over an extended period. Notifies Library Director toward end of quarter of status of received materials. Provides ready reference service using standard medical and non-medical reference tools, as well as on-line bibliographic databases. Refers clients to librarians as appropriate for in-depth reference services, conducting reference interview when needed. In the absence of the Medical Librarian, responsible for verifying accuracy and completeness of bibliographic data for inter-library loan requests by using CAT-LINE, the computerized on-line catalog system mounted by the National Library of Medicine. Must know protocols and search techniques for using system. (Supervisor's Name: Robert Lyle. Phone: 215-823-5860)

United States Military Academy Library
757 Corner of Thayer and Cullum Rds
West Point, NY 10996-1711

Dates Employed: 06/2002-08/2002
Grade Level: GS-9
Hours per Week: 20

Librarian, 1410

Served as general reference librarian at the central reference desk. The library collection is established for reference, research education purposes and is used by a variety of West Point personnel, including cadets, faculty, staff, and visiting researchers from other government agencies and educational institutions. The collection supports the USMA curriculum and academic programs and covers a wide variety of electronic resources and reference materials to instruct and assist cadets with research and use of resources. Provided library orientation and instruction for cadets, faculty, and staff. Participated in selection of information sources for the Library and develops specialized bibliographies as required. Provides night and weekend reference coverage. Assists with special projects relating to reference and circulation to include, but not limited to shelving, shelf maintenance, scanning, digitizing, collection review. Performs other duties as assigned. Temporary-term position. Resigned position to move to Washington state. Additional references: Nancy Keating, Reference Librarian, 845-938-8325, e-mail: un0857@exmail.usma.army.mil; Paul T. Nergelovic, Documents Librarian, 845-938-8270, up6257@exmail.usma.army.mil (Supervisor's Name: Georgianna Watson, ug0202@exmail.usma.army.mil. Phone: 845-938-8321.)

20th Medical Group & Base Hospital
Shaw Air Force Base, SC 29152
U.S.A.

Dates Employed: 08/1999-03/2000
Grade Level: GS-8
Hours per Week: 40

Director, Medical Resource Center & Library, 1411

Incumbent utilizes expertise, knowledge and skill to evaluate, acquire, and organize biomedical library resources in all formats. Incumbent conceptualizes service improvements for library users and works with and through others to implementation. Incumbent utilizes the "National Library of Medicine / Library of Congress" cataloging schemes, AACR2 and MARC cataloging principles as applied to use of state-of-the-art integrated online library systems, extended use of the Internet/World Wide Web, telecommunications protocols, DOCLINE, LOANSOME DOC, and other inter-library loan systems. Individual applies theory, principles, and techniques of librarianship in the reference functional area in a U.S. Air Force Base Hospital. Work includes the manipulation of hundreds

of online database systems used to provide bibliographic search retrieval information (DIALOG, STN, DTIC, MEDLARS), use of Internet/World Wide Web and appropriate search engines to locate specialized biomedical information, use of end-user search software packages (PubMed/Internet Grateful Med, GIDEON), web sites, electronic library resources and the training of biomedical researchers to use all resources. Resigned this position to care for a sick relative. (Supervisor's Name: Lt. Col. Sylvia Pringle.)

Huron University Library
Huron, SD 57350
U.S.A.

Dates Employed: 09/1998-03/1999
Hours per Week: 40

Interim Library Director & University Librarian
 Management of a growing multimedia collection, significant electronic access to collections within and outside of the library. A broad understanding of the operations and concepts in public and technical services, significant experience in collection development, working with computers, microforms and audio visual equipment systems, and in the development and administration of a library budget in support of academic programs. Worked productively with students, faculty and staff. Administration and supervision of staff and all library activities including collection development, library systems, operations, services, budget, etc. Responsible for administering the library, formulating policies, planning strategic directions, managing the budget and allocating resources, and supervising the professional faculty and classified staff. Guides and directs the development of state-of-the-art information technologies and integrates them with traditional library collections and services. Represents the Library to the University community and to external constituencies, with particular focus on library consortia and networks. Cataloging of library materials using Library of Congress classification and subject headings. Temporary, term position. (Supervisor's Name: John Zinng, Ph.D.)

Society of St. Pius X (Roman Catholic Religious Order)
Kansas City, MO
U.S.A.

Dates Employed: 10/1997-08/1998
Hours per Week: 40

Project Catalog Librarian
 Cataloging of library material using AACR2, Library of Congress Subject Headings and Classification. Marking and labelling of materials. Shelving of materials. Use of the Library of Congress on-line catalog via the internet and OCLC to look-up bibliographic information. This was a temporary position which ended when the project was completed. (Supervisor's Name: Peter Scott.)

Royal Saudi Naval Forces
Jubail, Saudi Arabia,
Saudi Arabia

Dates Employed: 02/1992-02/1994
Hours per Week: 48

Information Center Director
 Management of the Technical Information Branch at the King Abdul Aziz Royal Saudi Naval Base, Jubail, Saudi Arabia. Planned, developed and implemented policies regarding the management and distribution of naval technical

information. Received orders for technical publications from naval activities.
 Received materials from the printing plant and distributed them to the originating
 naval activity. Fluent in basic conversational Arabic.
 Temporary, contract position. (Supervisor's Name: Capt. Ibrahim Al-Buty.)

Internal Revenue Service
Room # 2710 Federal Building
Second & Marion
Seattle, WA 98104
U.S.A.

Dates Employed: 04/1988-11/1989
Grade Level: GS-5
Hours per Week: 40

Legal Clerk, 0904
 Assisting attorneys in the preparation of litigation. Word processing of pleadings
 filed before the United States Tax Court, the United States District Court and
 other state and federal courts. Management of the law library. Management of the
 office supply inventory.

Law Firm of McKinney, Stringer & Webster **Dates Employed: 06/1983-06/1984**
Oklahoma City, OK **Hours per Week: 20**
U.S.A.

Law Librarian
 Management and cataloging of law library materials using Library of Congress
 Classification and Subject Headings.

University of Oklahoma Law School Library **Dates Employed: 06/1982-05/1983**
Norman, OK **Hours per Week: 20**

Law Library Intern
 Working in rotation in all functional areas of the law library.

EDUCATION:

University of Oklahoma Graduate College
 Norman, OK 73019
 U.S.A.
 Master of Library Science, 1985
 Major: Library Science

Cameron University
 Lawton, OK 73505
 U.S.A.
 B.A., 1982
 130 Semester Hours
 Major: History
 Minor: Music
 GPA: 3.46 out of 4.00

University of Oklahoma Law School
 Norman, OK 73019

U.S.A.
50 Semester Hours
Major: Law

Oklahoma City University Law School
Oklahoma City, OK
U.S.A.
15 Semester Hours
Major: Law

JOB-RELATED TRAINING COURSES:

Library cataloging using AACR2, Library of Congress Subject Headings and Classification. Microsoft Office Suite.

JOB-RELATED SKILLS:

Microsoft Office Suite. Typing speed 60 WPM.

JOB-RELATED HONORS, AWARDS, MEMBERSHIPS, ETC.:

28 SEP 99 Commander's Coin Award for Performance Improvement Initiative,
20th Medical Group, Shaw Air Force Base, South Carolina.

President's Honor Roll, Cameron University, Lawton, Oklahoma.

Dean's Honor Roll, Cameron University, Lawton, Oklahoma.

Institutional Scholarship in History, Cameron University, Lawton,
Oklahoma.

Catholic Foundation of Oklahoma Scholarship, Oklahoma City, Oklahoma.

SUPPLEMENTAL INFORMATION:

EEO CATEGORIES

Hispanic, minority male over the age of 40 years.

PUBLICATIONS

Book review of Kaplan, Robert D. "The Arabist: the Romance of an American Elite." New York: Free Press, 1993 in v. 118 "Library Journal," p. 90, September 15, 1993. Also in "Book Review Digest 1994," New York: H. W. Wilson Co. 1995, p. 1071.

LIBRARY SERVICE PHILOSOPHY

"We are not afraid to entrust the American people with unpleasant facts, foreign ideas, alien philosophies, and competitive values. For a nation that is afraid to let its people judge the truth and falsehood in an open market is a nation that is afraid of its people."

-- John F. Kennedy

SUPPLEMENTAL DATA FOR AIR FORCE PERSONNEL CENTER, Randolph AFB, TX

John D. Horton. 443628610. 1. External; 2. Outstanding Scholar; 3. 05/11/1960; 4. Yes; 5. No; 6. No; 7. Yes, Career-Conditional; a. No; b. GS-8, 09/21/1999 to 03/15/2000; c. No; d. No; 8. Yes; 9. 60 WPM; 10. 0 WPM

RECOMMENDATIONS, TRANSCRIPTS AND SF-50's are available as e-mail attachments upon request.

REFERENCES

Georgianna Watson, Associate Director for User Service, United States Military Academy Library, 757 Corner of Thayer and Cullum Rds, West Point, NY 10996-1711, 845-938-8321, ug0202@exmail.usma.army.mil

Nancy Keating, Reference Librarian, United States Military Academy Library, 757 Corner of Thayer and Cullum Rds, West Point, NY 10996-1711, 845-938-8325, e-mail: un0857@exmail.usma.army.mil

Paul T. Nergelovic, Documents Librarian, United States Military Academy Library, 757 Corner of Thayer and Cullum Rds, West Point, NY 10996-1711, 845-938-8270, up6257@exmail.usma.army.mil

Do you Yahoo!?

Yahoo! Tax Center - File online, calculators, forms, and more

EXHIBIT 5

Holmberg, Christine

From: Fried, Michelle
Sent: Monday, August 18, 2003 7:38 AM
To: Holmberg, Christine
Cc: Cole, Keisha
Subject: FW: Librarian Position

FYI

-----Original Message-----

From: john horton [mailto:johndhorton@yahoo.com]
Sent: Thursday, August 14, 2003 7:29 PM
To: vp@rossmed.edu
Subject: Librarian Position

Back in February of this year Dr. JORGE CARLOS RIOS offered me the opportunity to interview for your librarian position. Two days before I was to fly to Dominca, someone in Human Resources cancelled my interview on the basis that your travel budget had been "over-booked" for that time period. I was promised the opportunity to interview at a later date. I am still waiting?

Please advise?

Also, please provide me with Dr. Rios email since I want to follow up on this with him personally since he was the one who promised me the opportunity to interview.

Thank you.

John D. Horton

Do you Yahoo!?

Yahoo! SiteBuilder - Free, easy-to-use web site design software

EXHIBIT 6

Holmberg, Christine

From: Sawitsch, Denise
Sent: Tuesday, August 19, 2003 12:25 PM
To: Rios, Jorge
Cc: Holmberg, Christine
Subject: Incident regarding John Horton

Importance: High

Dr. Rios,

I would like to inform you of an incident that occurred a short time ago. John Horton (Librarian applicant) stopped by the office to inquire about your contact information. When he asked Joyce, the receptionist, for this information she realized he was unexpected due to your location. She gave your email address and he started yelling asking why we still have the position advertised but he is not being considered. Based on his inappropriate unprofessional behavior, I recommend we have no further communication with him should he contact you.

Please feel free to contact me should you have any questions.

Sincerely,

Denise Sawitsch

EXHIBIT 7

Holmberg, Christine

From: Sawitsch, Denise
Sent: Monday, August 25, 2003 2:53 PM
To: Holmberg, Christine
Cc: Murphy, Nancy
Subject: 8/19/03 Incident

Christine,
I've attached a document as a result of my discussions regarding the incident with John Horton on the above date. Let me know if you need anything else.

Nancy,
Copy included for Sheryl's file.

Denise



incident.doc

I submit this document as a matter of record regarding an incident that occurred at approximately 12:15 PM August 19, 2003. Details have been provided as a result of my individual discussions with Joyce Beninato, Kathleen O'Mara and Jennifer Mounts.

John Horton entered the 10th floor office, met Joyce Beninato and asked to see Dr. Jorge Rios. Joyce explained to Mr. Horton that Dr. Rios was not here because he resided on the island of Dominica. Mr. Horton immediately began yelling and showed Joyce a picture of Dr. Rios that was along side of an article. Joyce got very upset because Mr. Horton was yelling and she wasn't sure who he was. As Mr. Horton continued yelling, he asked why he was not being considered for the Librarian job and why Ross University was still advertising the position. Mr. Horton continued yelling and stated that he would watch any future advertisements that Ross University would have for the Librarian position. His anger was visible. He continued raising his voice stating that he didn't understand why his island visit was canceled and he hoped Ross would lose the \$1,200 in airfare. During this time Jennifer walked through the lobby and could see Joyce was visibly upset. Jennifer stopped to ask Joyce if she could help because the phones were ringing and Mr. Horton appeared very focused and quite determined in what he was discussing with Joyce. Joyce confirmed that she was okay and Jennifer proceeded to the restroom without specifically noting their conversation and checked with Joyce again upon return to the reception area.

Kathleen was walking down the hall towards the reception area for the restroom. She stated that she could hear yelling from the reception area. When Kathleen arrived in the reception area she noticed Mr. Horton's anger and he was yelling and speaking with exaggerated hand motions. Kathleen heard Mr. Horton question why the Librarian job was still advertised in the paper. Kathleen paused, looked at Joyce and asked if she was okay. When Joyce said yes, Kathleen went to the restroom and when she returned Mr. Horton was gone.

In remedy to Dr. Horton's request to see Dr. Rios, Joyce offered Dr. Rios' email address. After Mr. Horton left, Joyce came into my office, visibly shaken and frightened by the encounter.

Respectfully submitted,

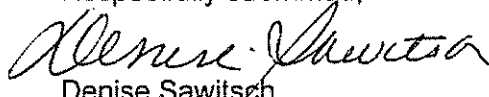

Denise Sawitsch
8/25/03

EXHIBIT 8

Holmberg, Christine

From: Rios, Jorge
Sent: Thursday, August 21, 2003 11:17 AM
To: Holmberg, Christine
Subject: RE: Library Director Position

You addressed the question to the wrong person. A therapist could have provided a more accurate answer !

-----Original Message-----

From: Holmberg, Christine
Sent: Wednesday, August 20, 2003 5:12 PM
To: Rios, Jorge
Subject: RE: Library Director Position

Jorge,
What is the history on this candidate? He has been sent a letter indicating we are no longer interested in him as a candidate back in April based on a candidate review with Tim. he continues to apply repeatedly and I have responded to him a number of times indicated we have other candidates with more experience under consideration.

Apparently he stopped by the office yesterday and interacted with Joyce and Denise.

His behavior indicated he is not a stable person able to exercise good judgment.

I will send him another letter indicating we are no longer considering him for the position.

Christine

-----Original Message-----

From: Rios, Jorge
Sent: Wednesday, August 20, 2003 10:43 AM
To: Holmberg, Christine
Subject: FW: Library Director Position

-----Original Message-----

From: john horton [mailto:johndhorton@yahoo.com]
Sent: Wednesday, August 20, 2003 10:18 AM
To: Rios, Jorge
Subject: Library Director Position

Dear Dr. Rios:

Back in January you invited me to Dominica to interview for the position of Library Director. You booked a flight for me and I was all ready to go. Two days before the flight's departure you cancelled the flight due to an "over extended travel budget." I was promised an interview at a later date. I am still waiting.

I keep seeing the position re-advertized on almost every library job board that exists so I would like to express my continued interest in the position.

Since the position has been open for at least 9 months, what is the time frame for you to make a decision or is it possible that the position might be left open indefinitely.

I visited your office in Edison, New Jersey yesterday. I was told that the Human Resources lady makes all the hiring decisions. Is your job in this process to do all the work of interviewing and selecting candidates and then this lady gets to shoot all your selections down?

Please advise.

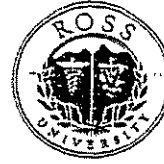
Thank you.

John D. Horton

Do you Yahoo!?

Yahoo! SiteBuilder - Free, easy-to-use web site design software

EXHIBIT 9



ROSS
UNIVERSITY

August 25, 2003

Mr. John D. Horton
General Delivery
Jobstown, NJ 08041-9999

Dear Mr. Horton:

We have received your application and resume for the position of Medical Librarian at Ross University.

The selection committee has carefully reviewed your background and qualifications and we will not be considering you for the Medical Librarian position.

Thank you for your interest in Ross University and best wishes in your future endeavors.

Sincerely,

Christine Holmberg
Vice President, Human Resources

EXHIBIT 10

Ross University
School of Medicine

Christine Holmberg
Vice President,
Human Resources

499 Thornall St., 10th Floor
Edison, New Jersey 08837-2235
phone 732-978-5300 x2533
fax 732-978-5305
cholmberg@rossmed.edu
www.rossmed.edu



ROSS
UNIVERSITY

August 25, 2003

Mr. John D. Horton
General Delivery
Jobstown, NJ 08041-9999

Dear Mr. Horton:

On Tuesday, August 19, 2003 at approximately 12:15 PM and Monday August 25, 2003 at approximately 4:00 PM you visited Ross University offices at 499 Thornall Street 10th floor. Both your visits were unscheduled. Today when you arrived you insisted that you wanted to see me even though you had no appointment.

Your behavior was discourteous and distressing to employees at Ross University. Two individuals asked you to leave, and you refused.

This letter is notification that you are not welcome at Ross University and should cease to communicate with anyone. If you disregard this notice and come to the University again, you are subject to arrest for trespassing.

Sincerely,

Christine Holmberg
Vice President, Human Resources

EXHIBIT 11

CURRICULUM VITAE

Marilyn B. Sullivan
8472 NW Overland Ct.
Kansas City, MO 64154
Phone/Fax: (816) 746-8670
Email: msulli7916@aol.com

Summary of Qualifications:

Over twenty years experience in journalism, medical and technical writing, editing, indexing and research.
Twenty five years experience in medical librarianship.

Experience:

Editorial advisor to School of Nursing and Medical Library Consultant, Kilimanjaro Christian Medical College, Moshi, Tanzania. February. 2002 August 2002.

Free-lance medical/technical writer, Kansas City, MO 1997-present.

Sept. 1983 - Apr. 1997 (retired). Chief, Health Sciences Libraries, University of Missouri-Kansas City (UMKC), Kansas City, MO.

Aug. 1982 - Sept. 1983. Acting Director of Medical College of Wisconsin (MCW) Libraries, Milwaukee, WI.

Sept. 1981 - Aug. 1982. On leave from MCW to organize and direct Faculty of Medicine Library, Kuwait University, Kuwait.

Prior to 1981, various positions in medical librarianship, medical writing, Milwaukee, Wisconsin. Writing jobs included industrial writer, Square D Company; editorial assistant, Olsen Publishing Company; editor for American Chemical Society; copywriter for WTMJ and WTMJ-TV television and radio, Milwaukee, Wisconsin.

Education:

MALS, University of Wisconsin - Milwaukee, Library and Information Science, 1968.

BA, University of Wisconsin - Madison, English/Biology, 1953.

American Medical Writers' Association core curriculum, completed Nov. 1996.

Certificate in Paralegal Studies, Rockhurst College, Kansas City, MO Aug. 1996.

Photography, Milwaukee Area Technical College, 52 credits, 1974 -

1983. Milwaukee, WI.

Medical Library Association CE courses with emphasis on computers, management, research and collection development.

Training workshops in various search techniques including Medline at the National Library of Medicine in Bethesda, MD (1972). Workshops in grant writing, copyright, marketing, budgeting, and programming.

Teaching: Cairo University, Department of Librarianship and Archives. Cairo, Egypt. On Fulbright grant, fall semester, 1992 - 1993.

Cairo University, Health Sciences Libraries, training class for employees of health sciences libraries (medicine, nursing, dentistry, pharmacy), Dec. 1992.

LS446 Health Science Librarianship and Bibliography, University of Missouri -Columbia, Columbia, MO. School of Library and Informational Science, Fall semester, 1987.

Medical Bibliography for Medical Students, Kuwait University, Faculty of Medicine, Kuwait, Spring semester, 1982.

Research portion of course in Scientific Communications for graduate students in physiology, Medical College of Wisconsin, Milwaukee, Fall semester, 1975.

LS544 Health Sciences Librarianship, reference portion, Madison, WI, Fall semester, 1975.

Medline Problem Clinics of the Midwest, Chicago, Sept. 11-12, 1975.

Basic Medical Reference, Medical Library Association CE courses taught at national and regional annual meetings in 1973 and 1974.

**Workshops/
Seminars:** Seminar in Nutrition and Health Care. Soviet Union, Nov. 29 - Dec. 6, 1988.

Legal Problems in the Health Care Field, Medical Library Seminars, Panel participant, University of Wisconsin, Extension. Jan. 14, 1971.

Memberships: American Medical Writers Association, 1989 - present.
Medical Library Association, 1971 - 1997.

Committees: American Medical Writers Association, Mid-America Chapter, President, 1998/1999.

Medical Library Association and Journal of the American Medical Association, Journal Review Panel, 1994 - 1997.
Medical Library Association, Midcontinental Chapter, Government Relations Committee, 1994 - 1996.
American Medical Writers Association, Mid-America Chapter, By-laws Committee, Chair, 1994.
Medical Library Association, International Cooperation Section, 1989 - 1997. Chair, 1991/92.
Medical Library Association, International Cooperation Committee, 1983 - 1989. Chair, 1985/86. (Became section in 1989).
Medical Library Association, Evaluation Committee for the Bulletin of the Medical Library Association, 1987 - 1991. Chair, 1990/91.
Medical Library Association, Cunningham Fellowship Selection Jury, Chair, 1986/87.
UMKC International Week Planning Committee, 1989 - 1992.
Medical Library Association, Planning Committee for Midcontinental Region, 1989 Annual Meeting and Chair of Budget Committee, 1986 - 1989.
Kansas City Library Network, Secretary, 1989/90 and 1995/96.
UMKC Faculty Senate (elected two terms) 1985/86 and 1986/88.
UMKC Search Committee for Director of Libraries, Chair, 1985.
UMKC Libraries Promotion Committee, 1984 - 1986.
UMKC Libraries Development Leave Committee, 1984 - 1986.
Kuwait University, Faculty of Medicine, Search Committee for Library Director, 1982.
Medical Library Association, Midwest Chapter, Publicity Chairman, 1982.

**Publications/
Presentations:**

"Health: An Interdisciplinary Journal for the Social Study of Health, Illness and Medicine" (journal review). Santos, R and Sullivan M. Journal of the American Medical Association 1998 Nov 11;280(18):1636.

"African Journal of the Health Sciences and African Journal of Medical Practice" (journal review). Comninellis N and Sullivan M. Journal of the American Medical Association 1997 Jan 1;277(1):86.

"Liver Transplantation and Surgery" (journal review). Pandya P and Sullivan M. Journal of the American Medical Association 1996 Sept 11; 176(10):837-8.

"Chinese Journal of Integrated Traditional and Western Medicine" (journal review). Wu W and Sullivan M. Journal of the American Medical Association 1996 Mar 13;275(10):1068-9.

"The Gastroenterologist: A Review Journal for Practitioners" (journal review). Chen S and Sullivan M. Journal of the American Medical Association 1995 Apr 5;273(13):1068-9.

"Psycho-oncology: Journal of the Psychological, Social and Behavioral Dimensions of Cancer" (journal review). Sirridge M and Sullivan M. Journal of the American Medical Association 1994 June 8:271 (22):806-7.

"Citation patterns in the health sciences: implications for serials/monographic allocation," Burdick AJ, Butler A, Sullivan MB. Bulletin of the Medical Library Association 1993 Jan;(1):44-47.

"Health information for a geriatric education training program," Sullivan MB. Paper presented at Sixth International Congress of Medical Librarianship, New Delhi, India, Sept. 25, 1990.

"Work/training programs for international health sciences librarians," Brennen PW and Sullivan MB. Bulletin of the Medical Library Association. 1988 Apr;77(2):170-5.

"The clinical medical librarian program as perceived by the CML," Sullivan MB and Sarkis J. Bulletin of the Medical Library Association. 1986 Apr;75(2):169-71.

"Medical libraries in China," Presentation to Kansas City Library Network, May 9, 1986. Based on visits to Chinese medical libraries, Oct. 1985.

"The CML program, a decade later," Sullivan MB. Proceedings of the Fifth International Congress of Medical Librarianship. Tokyo, 1985.

"CML in a satellite library," Glick J and Sullivan MB. Clinical Librarian Quarterly. 1984 Sept/Dec;3(1 & 2):5-9.

"Rx for medical reference: a bibliography of basic health sciences information sources," Haskell D, Sullivan M, Theobald M. Show-Me-Libraries 1984 Dec;36(3)5-10.

"The overseas library job; problems and special considerations pertaining to the Middle East," Paper presented at the Annual Meeting of the Medical Library Association, Denver, May 30, 1984.

"Medical library services in Kuwait: history and future prospects," Sullivan MB and Brennen PW. Bulletin of the Medical Library Association 1984. Jan;72(1):12-17.

Wisconsin resources," Chapter in Basic Library Management for Health Sciences Librarians, Midwest Health Science Library Network, Chicago,

1982.

Books Indexed: Nuclear Cardiology for Clinicians. Soin JS and Brooks HS. Mt. Kisco, NY, Futura press. 1980.

Social Work: quality assurance program, a complete analysis. Coulton CJ, National Association of Social Workers, 1979.

Consultations: Reviewer for Fulbright applications in field of library and information science, 1997 - 2000.

Cairo University, Egypt. Consultant for new medical library, Dec. 1992.

Zimbabwe, Evaluator of course materials used in Health Sciences Library Management Workshop conducted in Harare, Zimbabwe, Oct. 1988. Sponsored by the Agency for International Development.

Honors and Awards: Medical Library Association, Midcontinental Chapter. Bernice Hentzer award for excellence in academic health sciences librarianship. Oct. 1993.

Medical Library Association, admitted to membership in Academy of Health Information Professionals at distinguished member level, Apr. 1990; recertified at distinguished member level, Apr. 1995.

Fulbright Lecturing Grant to Cairo University, Egypt, Oct. 1, 1992 - Jan. 31, 1993.

References: Available on Request

EXHIBIT 12



Enrollment / Change Form

CIGNA International

Mailing Address: P.O. Box 15050
Wilmington, DE 19850

Section A - About You						
Account Number: <u>02538A</u>		Employer Name: <u>Ross University</u>		Coverage Effective Date: <u>9/1/04</u>		
Last Name: <u>Sullivan</u>		First Name: <u>Marilyn</u>		Middle Name: <u>B</u>		
Gender: <input type="checkbox"/> M <input checked="" type="checkbox"/> F		Marital Status: <u>Single</u>		Birth Date: <u>7/19/31</u>		
Country of assignment: <u>Dominica</u>		Country of citizenship: <u>USA</u>				
Current International Assignment Information (if necessary, please use the reverse side for additional addresses)						
Address:	Street: <u>ROSS UNIVERSITY</u> <u>EDISON, NJ ADDRESS</u> <u>499 THORNALL ST</u>		Home phone number: <u>767/445-6562</u>			
	City: <u>EDISON</u> State/Province: <u>NJ</u>		Work phone number: <u>767/255-6365</u>			
	Postal/ZIP code: <u>08837</u> Country: <u>USA</u>		Facsimile number:			
			E-mail address*: <u>msullivan@rossmed.edu</u>			
*Do you agree to accept the Notice of Privacy Practices from our Privacy Office electronically? <input type="checkbox"/> Yes <input type="checkbox"/> No						
Section B - Your Benefit Elections						
<input checked="" type="checkbox"/> Medical		<input checked="" type="checkbox"/> Employee Basic Life		<input checked="" type="checkbox"/> Accidental Death & Dismemberment		
<input type="checkbox"/> Dental		<input checked="" type="checkbox"/> Long Term Disability		<input type="checkbox"/> Employee Additional AD&D \$		
<input type="checkbox"/> Vision		<input type="checkbox"/> Short Term Disability		Annual Base Salary \$		
<input type="checkbox"/> Employee Additional Life \$				<input type="checkbox"/> Dependent Life-Spouse \$		
<input type="checkbox"/> Dependent Life-Children \$						
Section C - Your Dependent Benefit Elections						
Name & Coverage Type (M-Medical, D-Dental, V-Vision)		Relationship	Birth Date	Gender	Full-time student? **	Country of Residence
<input type="checkbox"/> M <input type="checkbox"/> D <input type="checkbox"/> V		Spouse		<input type="checkbox"/> M <input type="checkbox"/> F	Not Applicable	
<input type="checkbox"/> M <input type="checkbox"/> D <input type="checkbox"/> V				<input type="checkbox"/> M <input type="checkbox"/> F	<input type="checkbox"/> Yes <input type="checkbox"/> No	
<input type="checkbox"/> M <input type="checkbox"/> D <input type="checkbox"/> V				<input type="checkbox"/> M <input type="checkbox"/> F	<input type="checkbox"/> Yes <input type="checkbox"/> No	
<input type="checkbox"/> M <input type="checkbox"/> D <input type="checkbox"/> V				<input type="checkbox"/> M <input type="checkbox"/> F	<input type="checkbox"/> Yes <input type="checkbox"/> No	
<input type="checkbox"/> M <input type="checkbox"/> D <input type="checkbox"/> V				<input type="checkbox"/> M <input type="checkbox"/> F	<input type="checkbox"/> Yes <input type="checkbox"/> No	
**Please submit proof of full-time student status if dependent child is age 19 or over. If totally disabled prior to age 19, attach proof of disability for eligibility review.						
Section D - Changes						
If You Need to:			Then Provide This Information:			
ADD:	<input type="checkbox"/> Spouse		Date of Marriage			
	<input type="checkbox"/> Add Dependent Child		Date of Birth / Adoption:			
	<input type="checkbox"/> Spouse		Termination Date:			
DELETE:	<input type="checkbox"/> Dependent(s)		Termination Date:			
	<input type="checkbox"/> All Coverages		Former Name:			
	<input type="checkbox"/> Your Name		SHOW NEW ADDRESS IN SECTION A			
CHANGE:	<input type="checkbox"/> Your Address		Effective Date:			
	<input type="checkbox"/> Your Work Location					
ADD COVERAGE: <input type="checkbox"/> Non-Medical Coverage <input type="checkbox"/> Dental Coverage						
OTHER:						

Section E – Beneficiary Information (for Life & AD&D Insurance)			
Name(s) of Beneficiaries	Relationship	Address	Percentage of Insurance
MATTHEW SULLIVAN	SON	MILWAUKEE WI	33 %
EILEEN	DAUGHTER	ALBUQUE NM	33 %
ANDREW	SON	WAPPINGERS FALLS NY	33 %

This designation revokes any and all previous designations. The right to further change the beneficiary is reserved unto the Insured. Unless otherwise provided, where two or more beneficiaries are named under Life Insurance coverage, if any, the proceeds shall be paid in equal shares to the named beneficiaries, if surviving the insured. If no beneficiary survives, payment shall be made in accordance with the terms of the policy.

Employee signature:

Matthew Sullivan

Date:

7/29/04

Type of Change – please check off the appropriate change and complete the following sections:

- New Enrollment: complete sections A, B, C, and E (if applicable)
- Add/Remove Dependent: complete sections A, C, and D
- Add/End Change Coverage(s): complete sections A, B and D
- End all Coverage(s): complete sections A and D
- Address Change: complete sections A and D

Country of Residence Please list the country where each dependent lives. This information helps CIGNA International provide better customer service to you and your dependents.

Additional Addresses Please list any other addresses, who is at that address, and how CIGNA International should use that address (for example: claim payments)

Provisions

I authorize deductions from my earnings of the required contributions, if any, toward the cost of the insurance. This authorization applies only if employee contributions are required.

AUTHORIZATION TO DISCLOSE CONFIDENTIAL INFORMATION

I hereby authorize any person or entity having my Confidential Information to provide it to CIGNA International * and I authorize CIGNA International to provide my Confidential Information to any person or entity for the purpose of payment of my claims and health care operations. I am making this authorization for myself and as the agent or representative of my spouse and any dependent children. I understand that this authorization will remain in effect until I send written notice revoking it to CIGNA International, or for such shorter period as may be required by law. Until revoked, CIGNA International, and other parties disclosing my Confidential Information to CIGNA International for the purposes set forth above, may rely upon this authorization. I understand that I may ask to receive a copy of this authorization.

* "CIGNA International" refers to the various operating subsidiaries of CIGNA Corporation. Products and services are provided by these subsidiaries and not by CIGNA Corporation. CIGNA Corporation is a holding company and is not an insurance or operating company.

FRAUD NOTICE: Any person who knowingly, and with intent to injure, defraud or deceive any insurer, files a statement of claim containing any false, incomplete or misleading information is guilty of a felony.

Send Form to:

For Mail Deliveries:
CIGNA International Expatriate
Benefits
P.O. Box 15050
Wilmington, DE 19850

Direct Fax: 302.797.3180

For Courier Deliveries
CIGNA International Expatriate
Benefits
590 Naamans Road
Claymont, DE 19703